UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUN 22 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7677 9494
RETURN RECEIPT REQUESTED

Mr. Jack Verdegan
Director of Operations
Sintex-Wausaukee Composites
837 Cedar Street
Wausaukee, Wisconsin 54177

Re: Notice of Violation
Compliance Evaluation Inspection
WID980904684

Dear Mr. Verdegan:

On May 17, 2016, a representative of the U.S. Environmental Protection Agency inspected Sintex-Wausaukee Composites located in Wausaukee, Wisconsin (hereinafter "SWC," "facility," or "you"). As a small quantity generator of hazardous waste, SWC is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. ("RCRA"). The purpose of the inspection was to evaluate SWC's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by SWC, EPA's review of records pertaining to SWC, and the inspector's observations, EPA has determined that SWC violated RCRA requirements related to the storage and management of universal waste, as described in paragraphs 1 and 2 below:

1. Universal Waste Lamp Management Requirements

Under Wis. Admin. Code § NR 673.13(4) [40 C.F.R. § 273.13(d)], a small quantity handler of universal waste must contain universal waste lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

SWC is a small quantity handler of universal waste because it accumulates less than 5,000 kilograms of universal waste on its site at any time. At the time of inspection, SWC maintained a universal waste storage area above a small office space in its Building 11.

Dozens of universal waste lamps were observed in the area, some of which were not in containers or packages that could prevent breakage. The majority of the universal waste lamps observed in the area were placed in boxes, but these boxes were not closed. SWC, therefore, violated the universal waste storage requirements above.

2. Universal Waste Lamp Labeling Requirements

Under Wis. Admin. Code § NR 673.14(5) [40 C.F.R. § 273.14(e)], a small quantity handler of universal waste lamps must label each container which stores universal waste lamps with the words "Universal Waste - Lamps," "Waste Lamps," or "Used Lamps."

SWC is a small quantity handler of universal waste because it accumulates less than 5,000 kilograms of universal waste on its site at any time. At the time of inspection, SWC maintained a universal waste storage area above a small office space in its Building 11. Dozens of universal waste lamps were observed in the area, the majority of which were placed in boxes for storage. These boxes, however, were not labeled or marked with one of the phrases above. SWC, therefore, violated the universal waste labeling requirement above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order, or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken to establish compliance with the above requirements. You should submit your response to Mr. Brian Kennedy, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Kennedy, of my staff, at (312) 353-4383 or at kennedy.brian@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Michael Ellenbecker, WDNR, michael.ellenbecker@wisconsin.gov

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSPECTION DATE:	May 17, 2016
SITE NAME:	Sintex-Wausaukee Composites
ADDRESS:	837 Cedar Street Wausaukee, Wisconsin 54177
EPA ID NUMBER:	WID 980 904 684
GENERATOR STATUS:	Small Quantity Generator (2015)
NAICS CODE:	32619 Other Plastics Product Manufacturing
FACILITY CONTACT:	Jack Verdegan Director of Operations
EPA INSPECTOR:	Brian Kennedy Environmental Engineer Compliance Section 2 RCRA Branch Land and Chemicals Division

PREPARED BY: Brian Kennedy — **Brian Kennedy** — 6/9/2016 — **Date**

APPROVED BY: — **Julie Morris, Chief**
Compliance Section 2 — 6/10/16 — **Date**

Purpose of Inspection

An unannounced Compliance Evaluation Inspection (CEI) of Sintex-Wausaukee Composites (hereinafter "SWC" or "facility") located at 837 Cedar Street, Wausaukee, Wisconsin took place on May 17, 2016. The CEI was conducted by U.S. Environmental Protection Agency personnel and was an evaluation of the facility's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) and its implementing regulations found in the Wisconsin Administrative Code and the Code of Federal Regulations. More specifically, the CEI was an evaluation of SWC's compliance with the regulations governing generators of hazardous waste.

Participants

The following persons were present for part or all of the inspection:

Jack Verdegan – Director of Operations	SWC
Karen Delaet – Human Resources Coordinator	SWC
Brian Kennedy – Environmental Engineer	U.S. EPA

Introduction

I arrived on site at 9:00 AM CST, entered the front office and requested to see the site's environmental coordinator. Shortly thereafter Mr. Jack Verdegan, SWC's Director of Operations, arrived and led me to his office for an opening conference. Ms. Karen Deleat, SWC's Human Resources Coordinator also joined the opening conference. I presented Mr. Verdegan my enforcement officer credentials and business card and provided him the Small Business Resource and Pollution Prevention information sheets. I described the purpose of the U.S. EPA RCRA inspection and the process by which I would conduct the inspection, including a site tour that would involve photographs of hazardous waste storage areas as well as a review of SWC records pertaining to hazardous waste.

I informed Mr. Verdegan of SWC's right to claim any information or documents collected during the inspection as confidential business information, as applicable.

Site Description

The following information about SWC is based on personal observations of the EPA inspector and on representations made during the inspection by facility personnel identified above or within the text unless otherwise specified.

SWC is a manufacturer of a wide variety of fiberglass reinforced plastic ("FRP") components for use in the construction, agricultural, mass transit, and medical industries. From SWC's website (www.wauscomp.com/about/operations/wausaukee): "SWC's Wausaukee facility offers state of the art manufacturing with an extensive range of FRP processes and finishes. Our unique cell design and lean concepts offers our customers lower costs, outstanding quality and the ability to meet critical production schedules unmatched by industry standards. The Wausaukee facility offers our customers the greatest flexibility in production options from RTM, LRTM and Open Molded products. We serve many diverse markets and currently mold engine hoods, medical

imaging & diagnostic covers, light rail components, waste water treatment covers and recreational hoods and fenders."

SWC's products are made to customer specification using two primary manufacturing processes: open molding and light resin transfer molding ("LRTM"). In open molding, a colored gel coat is sprayed into a component mold and set to dry. This will become a glossy outer coating to a finished product. Layers of fiberglass strips are then placed over the gel coat, sprayed with liquid resin, and hand-rolled flat to provide the reinforced backing to the component. Once the resin and fiberglass has dried, the finished product is pulled out of the mold and rough edges are trimmed and sanded. In LRTM, a colored gel coat is also sprayed into a component mold and fiberglass is placed over this gel coat. A backshell mold is then placed over the fiberglass, compressing the material, and an applied vacuum pulls resin into the compressed mold until the fiberglass is saturated. Once dry, the compressed mold is opened and the formed product is removed. SWC occasionally paints its finished products in several paint booths on its site.

SWC's Wausaukee facility was originally constructed in 1940 and operated as a company known as Miro, which constructed fiberglass boats. In 1982, the facility began operating as Wausaukee Composites. In 2008, Wausaukee Composites was purchased by Sintex, an Indian multinational corporation which specializes in the plastics sector, leading to the name Sintex-Wausaukee Composites. Sintex-Wausaukee Composites also operates other facilities in Gillet, Wisconsin and Owosso, Michigan, and previously owned a facility in Cuba City, Wisconsin. Currently, SWC has 140 employees, including management at its Wausaukee location. There are two primary shifts per day Monday through Friday, and a third skeleton shift which operates on weekends.

SWC's manufacturing operations are divided into ten product departments and housed in several buildings around site. Most production takes place in Buildings 2 through 8 and Buildings 10 and 11. Buildings 2 through 8 are contiguous, as are Buildings 10 and 11. Buildings 9 and 12 through 19 house SWC's shipping and receiving areas, tooling and equipment storage, and waste storage areas. These buildings are all standalone structures.

Wastes generated by SWC include scrap FRP trim and dust, paint and related waste including excess paint and dirtied booth filters, waste acetone still bottoms from an on-site acetone recovery still, and universal waste lamps and batteries. FRP trim and dust is disposed of as non-hazardous waste, although occasionally SWC is able to reconstitute the dust into a putty for reuse on FRP products. This material is accumulated in a variety of roll-off containers and dust collectors around SWC's site. Waste paint is generated from SWC's painting operations and is accumulated in 55-gallon satellite drums prior to removal to a dedicated waste storage area. SWC has characterized this material as D001 and F003 hazardous waste. Dirtied paint booth filters are dry when disposed and are managed by SWC as non-hazardous waste. SWC maintains a solvent still to reclaim waste acetone it generates around site. Still bottoms are accumulated in a 55-gallon satellite drum prior to removal to the dedicated waste storage area. SWC has also characterized this material as D001 and F003 hazardous waste. The dedicated hazardous waste storage area is located in a small shed near Building 15. SWC ships its hazardous waste to WRR Environmental Services in Eau Claire, Wisconsin for disposal. Universal waste lamps, batteries and other electronics are maintained in a separate storage area in Building 11.

Used oil is occasionally generated from SWC's fork trucks. However, the servicing company that changes the oil removes the material from site when they are finished. SWC operates a quality assurance lab on site to test the chemistry of its resin, catalyst and fiberglass combinations and ensure the quality of the FRP. Its primary waste stream are dry, set plastics pieces which are managed as non-hazardous material. SWC recently purchased an aerosol can puncturer to begin managing its waste aerosol cans as scrap metal. The liquid that drains from any punctured can is collected in a dedicated 55-gallon satellite drum equipped with a VOC collector. SWC has yet to dispose of the liquid as very little has accumulated thus far.

The quantity of hazardous waste paint and still bottoms generated by SWC varies from year to year. SWC last notified as a large quantity generator of hazardous waste in 2013, and in 2014 and 2015 notified as a small quantity generator of hazardous waste.

Site Tour

Mr. Verdegan led the tour through SWC's facility, which began in the largest production area of Buildings 2 through 8. In Building 2, SWC houses several different manufacturing departments including medical and mass transit. Mr. Verdegan showed several finished products in the area as well as photos of other products typically made in these departments. No waste was observed in Building 2.

Moving to Building 3, Mr. Verdegan pointed out SWC employees applying the finishing touches to molded engine hoods for use on agricultural vehicles. We also viewed trimming areas where waste FRP is collected for disposal, as well as numerous dust collectors against the outer walls of the area which accumulate dust from cutting operations. There was a small painting booth near this finishing area and we spoke briefly with the SWC employee working in the booth. He pointed out the satellite accumulation drum where hazardous paint waste is accumulated prior to removal to the dedicated waste storage area. The satellite drum was closed and labeled as hazardous waste (See Photo 1 in Attachment A: Inspection Photographs). I asked Mr. Verdegan about the filters along the back of the paint booth which filter outgoing air during spraying operations. He said the filters occasionally changed out based on air pressure manometer readings and are managed as non-hazardous waste when disposed. Another satellite drum near the painting booth was being used to accumulate waste acetone (See Photo 2). This drum was also closed and labeled as hazardous waste.

Moving through the remainder of Building 3, Mr. Verdegan pointed out the open molding process for several mass transit components. We viewed a gel coat being sprayed into a component mold and several SWC employees applying fiberglass and resin into another.

SWC maintains its waste acetone solvent still near the southwest corner of Building 3. A 55-gallon satellite drum near the still was being used to accumulate waste bottoms that are produced during the regeneration process (See Photo 3). This drum was closed and marked as hazardous waste. Several other 55-gallon drums were near the solvent still, including a drum of waste acetone waiting to be regenerated (See Photo 4) and a drum accumulating waste liquids from punctured aerosol cans (See Photo 5). Both drums were closed and marked as hazardous waste. There were three additional 55-gallon drums near the solvent still, two of which contained waste

acetone waiting for regeneration and a third which was still acting as a satellite drum for paint waste (See Photo 6). The three drums were grounded, closed and marked as hazardous waste. The tour continued to a small maintenance shop on the north side of Building 3. No waste was observed in the area, though SWC did maintain a small acetone wash tray in the shop. When the acetone is spent or too contaminated to clean equipment it is taken to the still for regeneration.

Toward the west end of Building 3 and moving into Building 8, SWC's production changes from open molding processes to light resin transfer molding, or LRTM. Mr. Verdegan explained the LRTM process and pointed out several active molds under vacuum. He explained that prior to LRTM, SWC conducted a more intensive resin transfer molding, known just as RTM, which involved heavy backshell molds and supports. LRTM is now used more frequently as it requires less resin and emits less volatile compounds into the air.

The tour continued out of the west end of Building 8 and through the standalone Buildings 9 and 18, both of which are used by SWC for shipping and receiving space. No waste was observed in these buildings. We proceeded next to SWC's dedicated hazardous waste storage area, which is located in a small steel shed just north of Building 15. There were seven drums of hazardous waste observed in the storage shed (See Photo 7), all of which were waste acetone still bottoms. All drums had a hazardous waste label and descriptor. All drums in the area were dated excluding one drum (Drum 2996). However, a clipboard containing the waste area inspection logs recorded the date the drum had arrived at the storage area as 5/9/2016 (See Photo 8). This date was then marked on the drum label. The oldest drum in the area was dated 3/11/2016. The storage shed itself was on a bermed concrete pad, and SWC maintained a spill kit, fire extinguisher, and protective equipment within the shed (See Photo 9). A drum marked used oil was in the shed, though Mr. Verdegan could not attest to where the used oil had come from and estimated that the drum and been present for some time (See Photo 10).

Mr. Verdegan next led the tour through the other standalone buildings on site. We briefly viewed Buildings 13, 14, and 19, all of which housed a variety of master molds and other pieces of equipment, and Building 12, which housed rolls of fiberglass that are used in SWC's process. We continued east to Buildings 10 and 11, which house additional LRTM manufacturing space and a stock room for small components (screws, fasteners, etc.). A 55-gallon satellite drum in Building 11 was accumulating waste acetone (See Photo 11). The drum was closed and labeled as hazardous waste. No waste was observed in Building 10.

SWC stores its universal waste in several wooden bins and shelves above a small office space in Building 11. Dozens of universal waste bulbs were observed in and out of boxes in these shelves, and many boxes were open (See Photo 12). The boxes did not appear to be labeled or dated, though the shelf had been labeled as "Lamps to be Recycled." Opposite the universal waste bulbs were two wooden crates labeled as "Batteries to be Recycled" and "Ballasts to be Recycled." Because the crates were raised above the ground it was unclear if waste batteries or ballasts were present, though waste electronic equipment appeared to be in one of the crates (See Photo 13). I briefly explained the universal waste management requirements to Mr. Verdegan.

The tour ended back at the main office around noon. The inspection broke for lunch and I returned to review records at 1:00 PM.

Record Review

I requested to see the following records:

- Hazardous waste manifests for the previous three years and associated land disposal restriction notification forms
- Hazardous waste profiles and waste characterization records
- Hazardous waste annual reports submitted to the WDNR
- Hazardous waste contingency plan
- Personnel training records for hazardous waste training sessions

A diagram of SWC's facility is in Attachment B.

Mr. Verdegan provided copies of training certificates for several employees in hazardous waste management procedures from 2015 and 2014, as well as an internal list of those employees and their job areas. The certificates attested to in-classroom training in hazardous waste management procedures as provided by the Federation of Environmental Technologists. Mr. Verdegan said that in addition to the classroom training, SWC also has the relevant employees view several videos on hazardous waste management on an annual basis. Copies of these records are in Attachment C.

I reviewed SWC's hazardous waste manifest records from 2012 to present. SWC has roughly four to five shipments every year, all of which have been taken to WRR Environmental Services for disposal since 2012. The manifests reviewed all appeared complete and SWC maintained all signed TSD copies. Land disposal restriction notification forms were also available in the manifest records for the still bottoms and paint waste, as were hazardous waste storage area inspection records.

Mr. Verdegan provided copies of SWC's annual hazardous waste reports from 2013 to present that were submitted to the WDNR. In 2014 and 2015 SWC had been a small quantity generator of hazardous waste, and Mr. Verdegan anticipated that SWC would again be a small quantity generator in 2016. SWC had notified as a large quantity generator in 2013 and also 2011. Mr. Verdegan said SWC's generator status could change depending on the business climate, but SWC generally attempts to operate by the requirements applicable to large quantity generators, regardless of the facility's waste generation rate.

WRR Environmental waste profiles were reviewed for SWC's paint and still bottom waste streams. Both waste profiles characterized the material as D001 and F003 hazardous waste and were dated 2015. An older waste profile for the paint waste stream from SWC's previous disposal facility, Brenntag Great Lakes, had the waste codes D001, D035, and F003. It was unclear why the D035 code was no longer associated with the waste stream in the WRR profile, as analytical results were not readily available.

SWC maintains an Emergency Response Plan which details the employee action necessary in the event of various emergencies and chemical and hazardous waste spills. The plan lists Jack Verdegan and Scott Suzawith as the primary and alternate emergency coordinators, respectively. The plan also detailed the evacuation actions and routes around site, as well as SWC's

coordination with local emergency authorities like the Wausaukee Volunteer Fire Department. Maps of evacuation routes and fire alarm system components (sprinkler heads, strobe lights, etc.) were also available. A list of emergency equipment around site is available on page 11 of the plan, but the list does not provide a description of the equipment or specify where it is located. A copy of the Emergency Response Plan is in Attachment D.

Closing Conference

I summarized my review of the site and potential issues to Mr. Verdegan. The items discussed included:

- The requirement to date drums of hazardous waste in the dedicated hazardous waste storage area, though the issue had been corrected during the inspection
- Universal waste management requirements for lamps, batteries, and ballasts
- The amount of detail necessary for emergency equipment in a hazardous waste contingency plan
- Whether or not WRR had conducted analysis on SWC's paint waste stream and if the D035 waste code was still necessary

Mr. Verdegan did not make any confidential business information claims during the inspection.

The inspection ended at 2:30 PM.

Attachments

A. Inspection Photographs
B. Facility Diagram
C. Employee Training Records
D. Emergency Response Plan
E. Inspection Checklists

ATTACHMENT A: Inspection Photographs

Photographs were taken by Brian Kennedy using a Canon PowerShot A2400 IS Digital Camera.

RCRA Photo Log

Photo	Description	Time (CST)
1	Satellite accumulation drum of paint waste in Building 3.	10:33 AM
2	Satellite accumulation drum of waste acetone in Building 3 and adjacent to the drum in Photo 1.	10:34 AM
3	Satellite accumulation drum of waste acetone still bottoms near the solvent still in Building 3.	10:55 AM
4	A satellite drum of waste acetone near the solvent still that was waiting to be reclaimed in Building 3.	10:55 AM
5	A satellite drum near the solvent still area that accumulated waste liquids from punctured aerosol cans in Building 3.	10:56 AM
6	A satellite drum of paint waste (right) and two drums of waste acetone waiting to be reclaimed near the solvent still in Building 3.	10:56 AM
7	Drums of hazardous waste in SWC's dedicated waste storage shed.	11:24 AM
8	A hazardous waste drum inspection log in the dedicated waste storage shed which tracked each drum's arrival date and contents.	11:23 AM
9	The spill kit, fire extinguisher, and other equipment kept in the dedicated waste storage shed.	11:24 AM
10	A drum of used oil in the dedicated waste storage shed.	11:27 AM
11	Satellite accumulation drum of waste acetone in Building 11.	11:40 AM
12	Universal waste lamps being accumulated in Building 11.	11:51 AM
13	Crates meant to hold universal waste batteries and ballasts opposite the lamps in Photo 12.	11:51 AM

Photo 1:

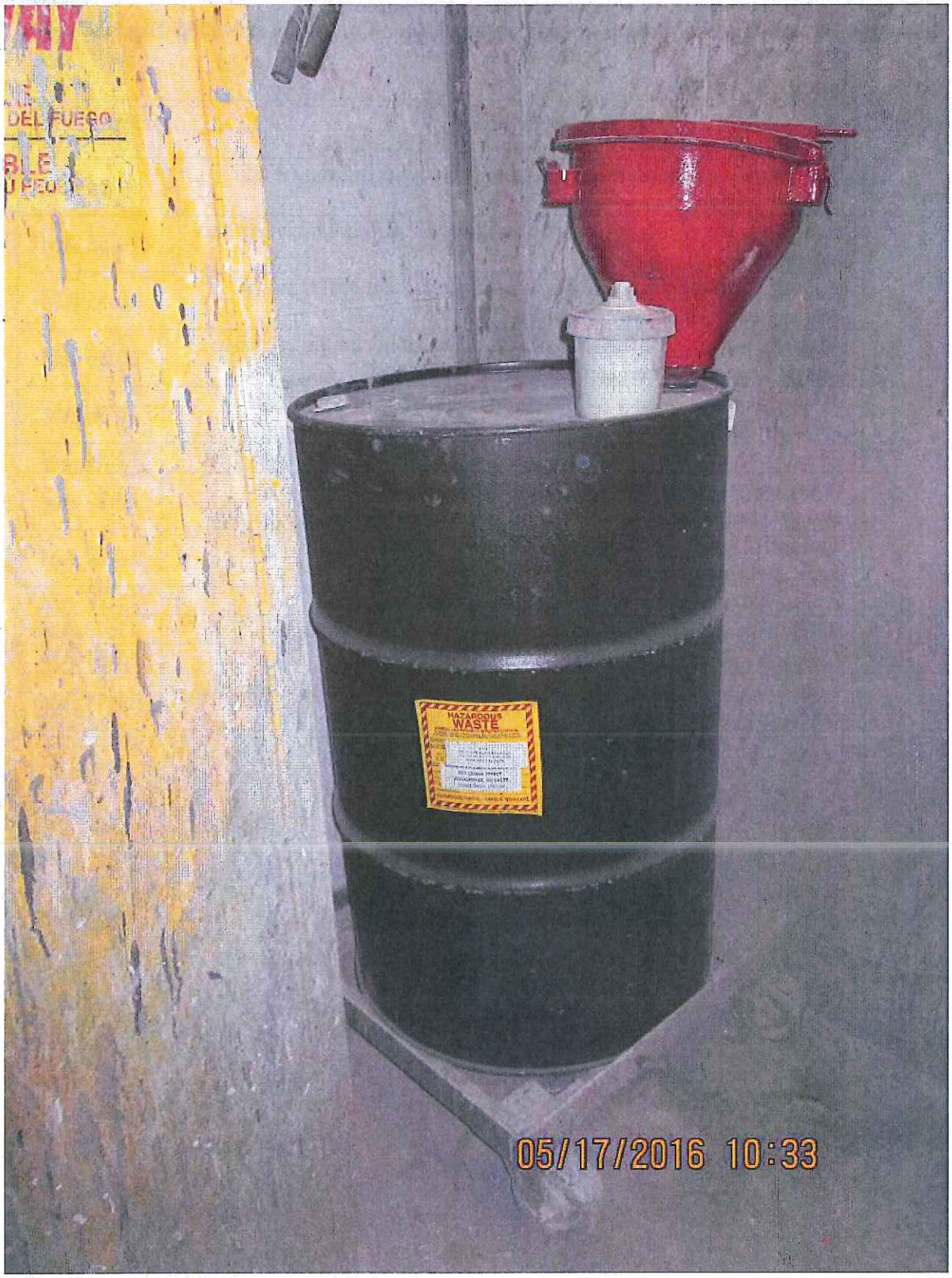


Photo 2:

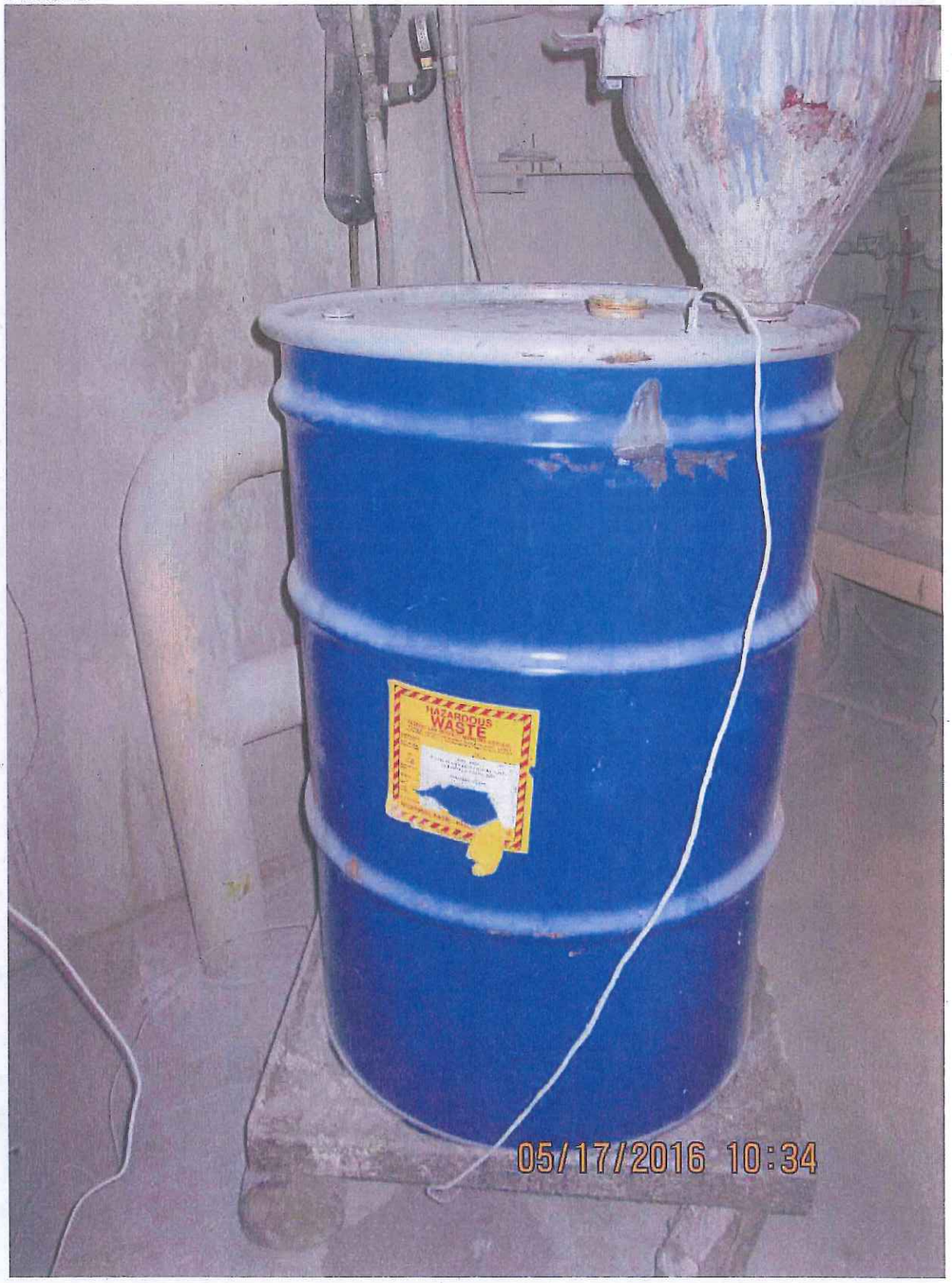


Photo 3:

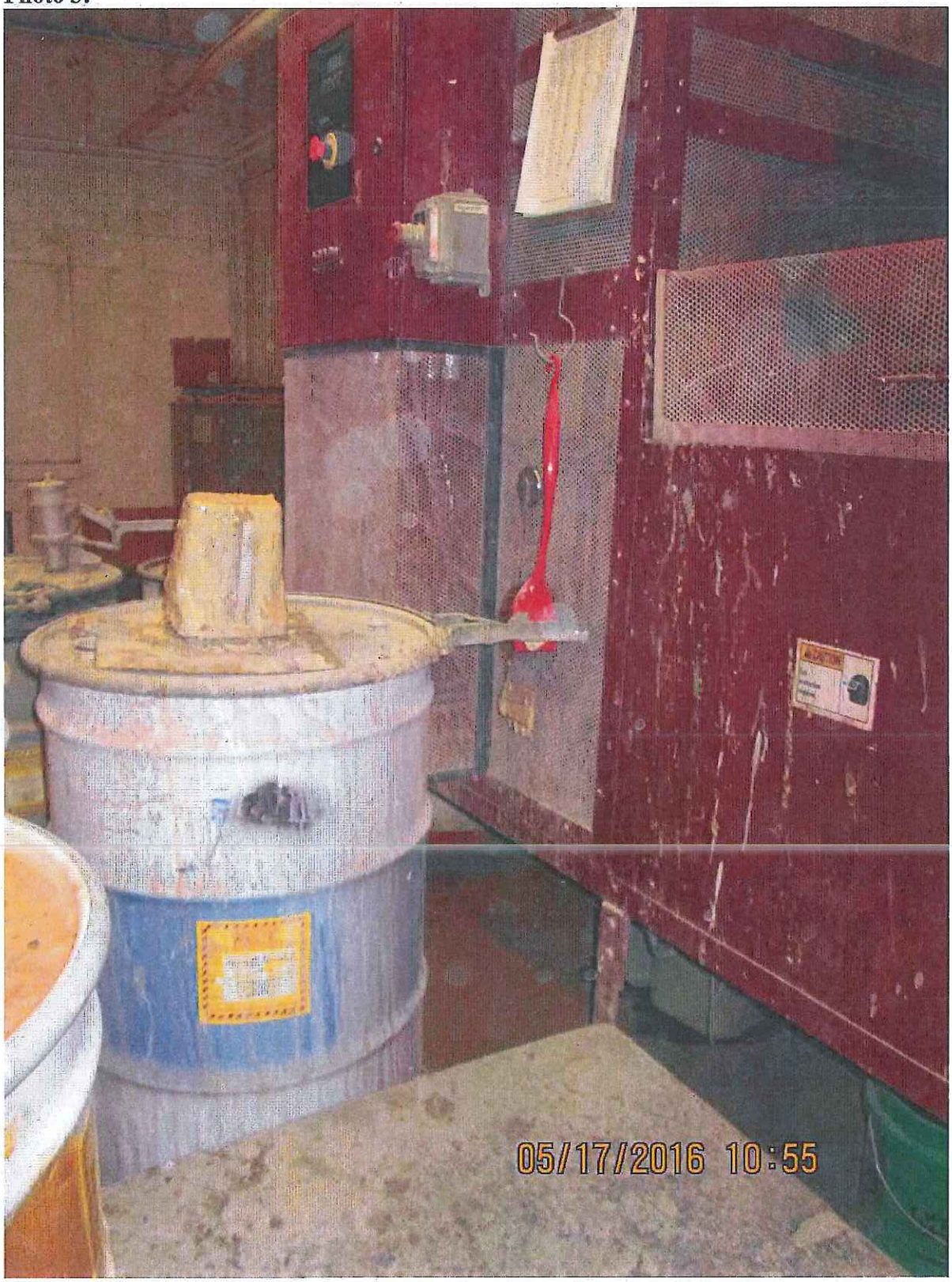


Photo 4:

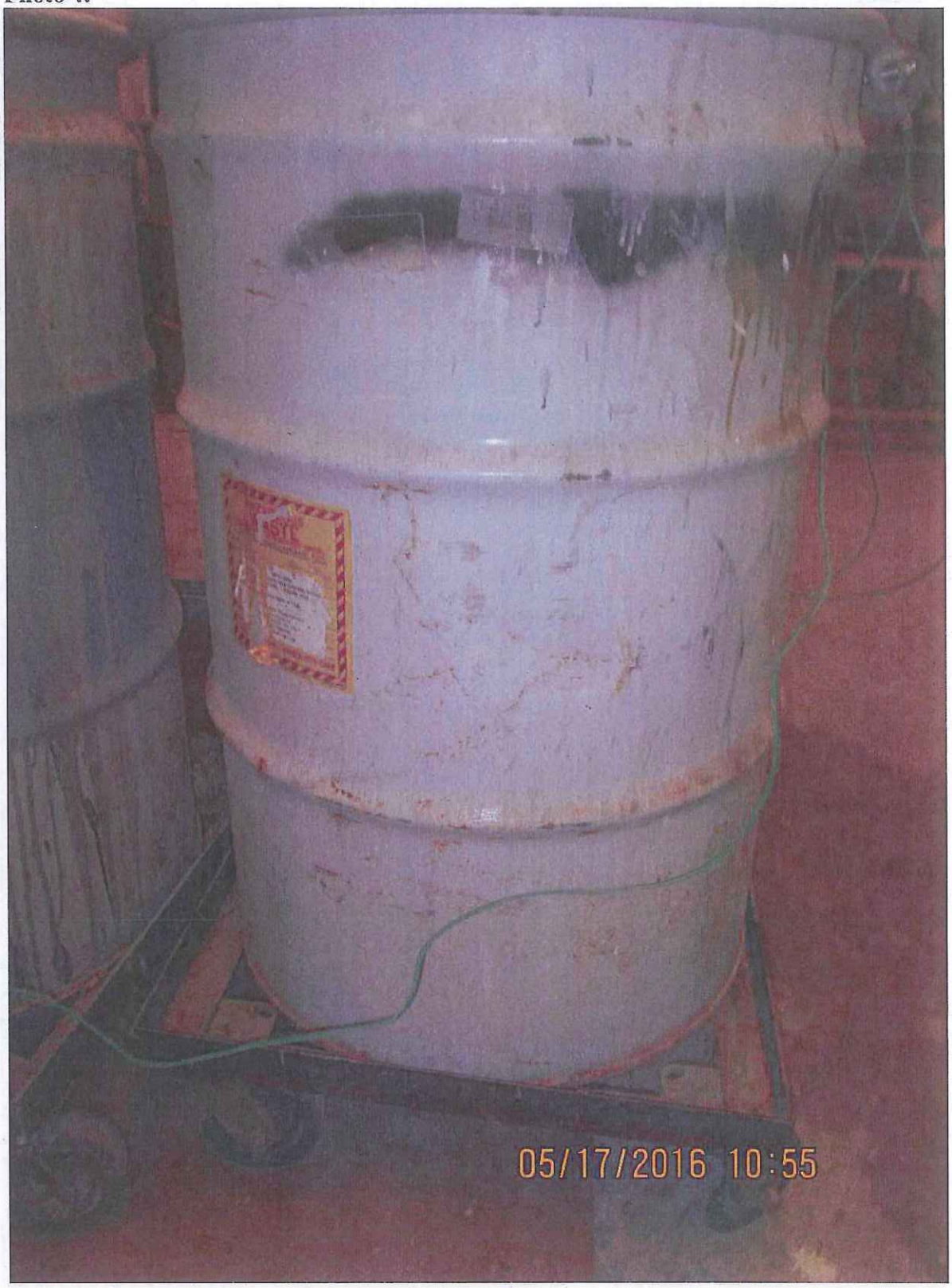


Photo 5:

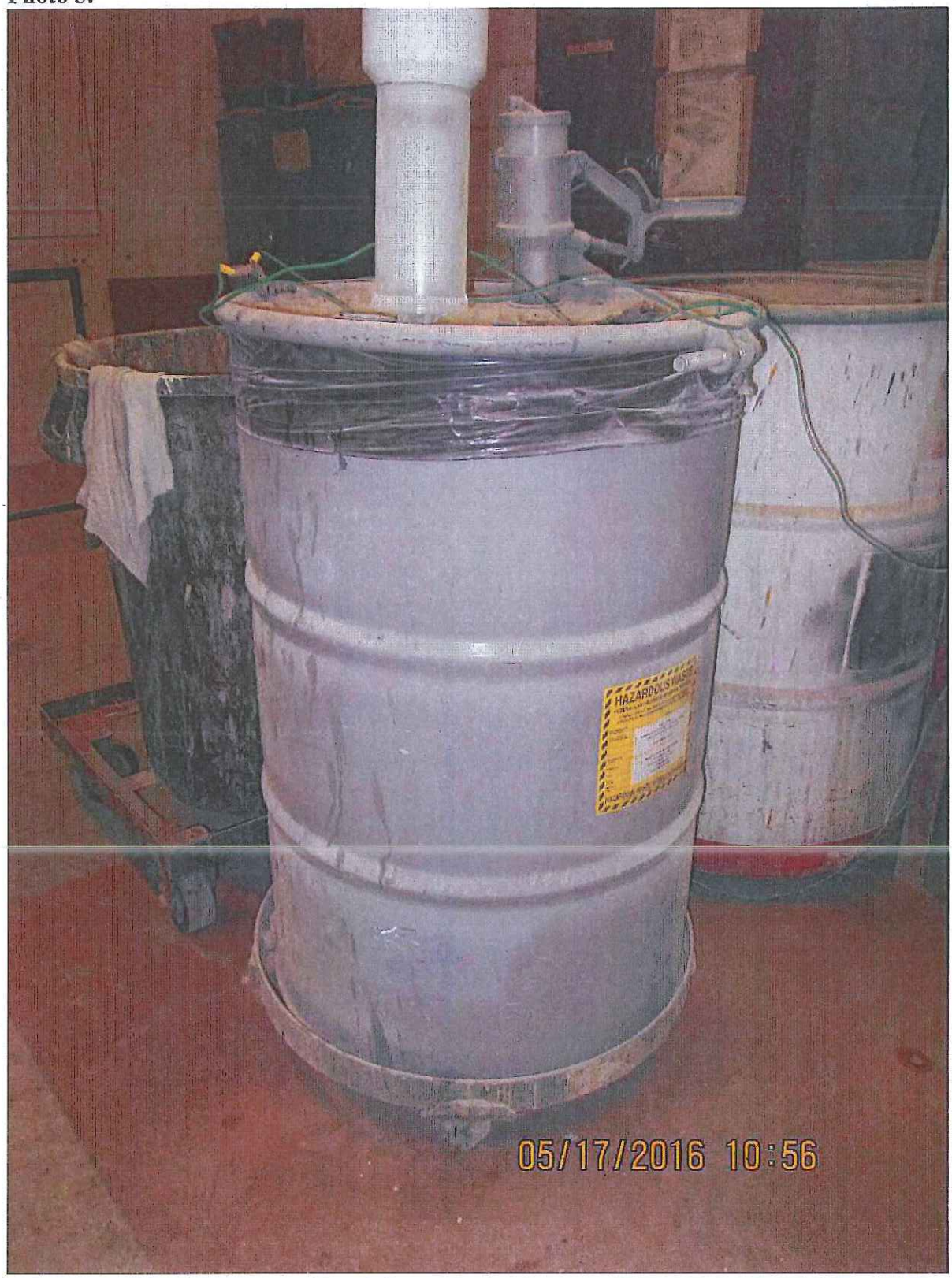
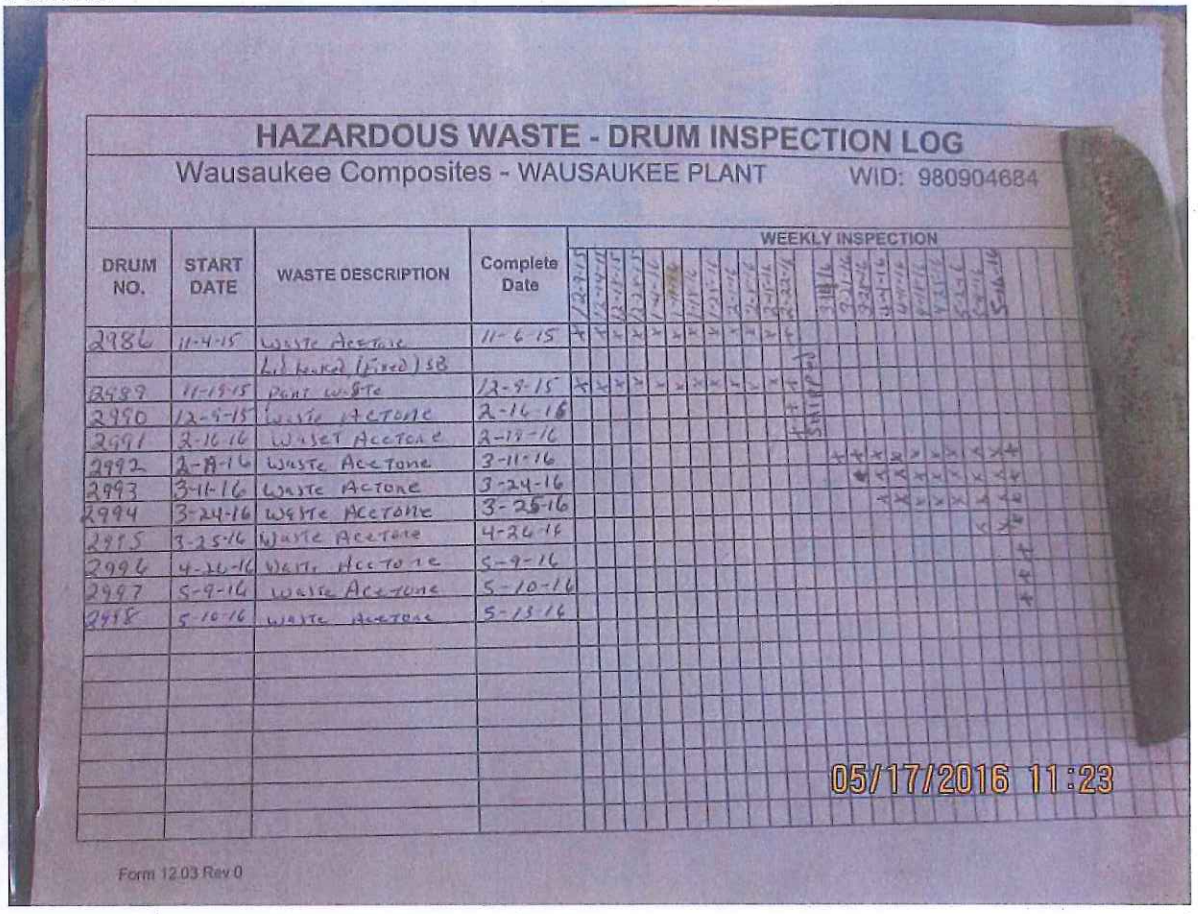


Photo 6:

Photo 7:

Photo 8:



HAZARDOUS WASTE - DRUM INSPECTION LOG

Wausaukee Composites - WAUSAUKEE PLANT WID: 980904684

DRUM NO.	START DATE	WASTE DESCRIPTION	Complete Date	WEEKLY INSPECTION
2986	11-4-15	Waste Acetone	11-6-15	
		Lab Pack (Fired) SB		
2989	11-19-15	Paint waste	12-9-15	
2990	12-9-15	Waste ACETONE	2-16-16	
2991	2-16-16	WASET ACETONE	2-19-16	
2992	2-19-16	Waste Acetone	3-11-16	
2993	3-11-16	Waste Acetone	3-24-16	
2994	3-24-16	Waste Acetone	3-25-16	
2995	3-25-16	Waste Acetone	4-26-16	
2996	4-26-16	Waste Acetone	5-9-16	
2997	5-9-16	Waste Acetone	5-10-16	
2998	5-10-16	Waste Acetone	5-13-16	

05/17/2016 11:23

Form 12.03 Rev 0

Photo 9:

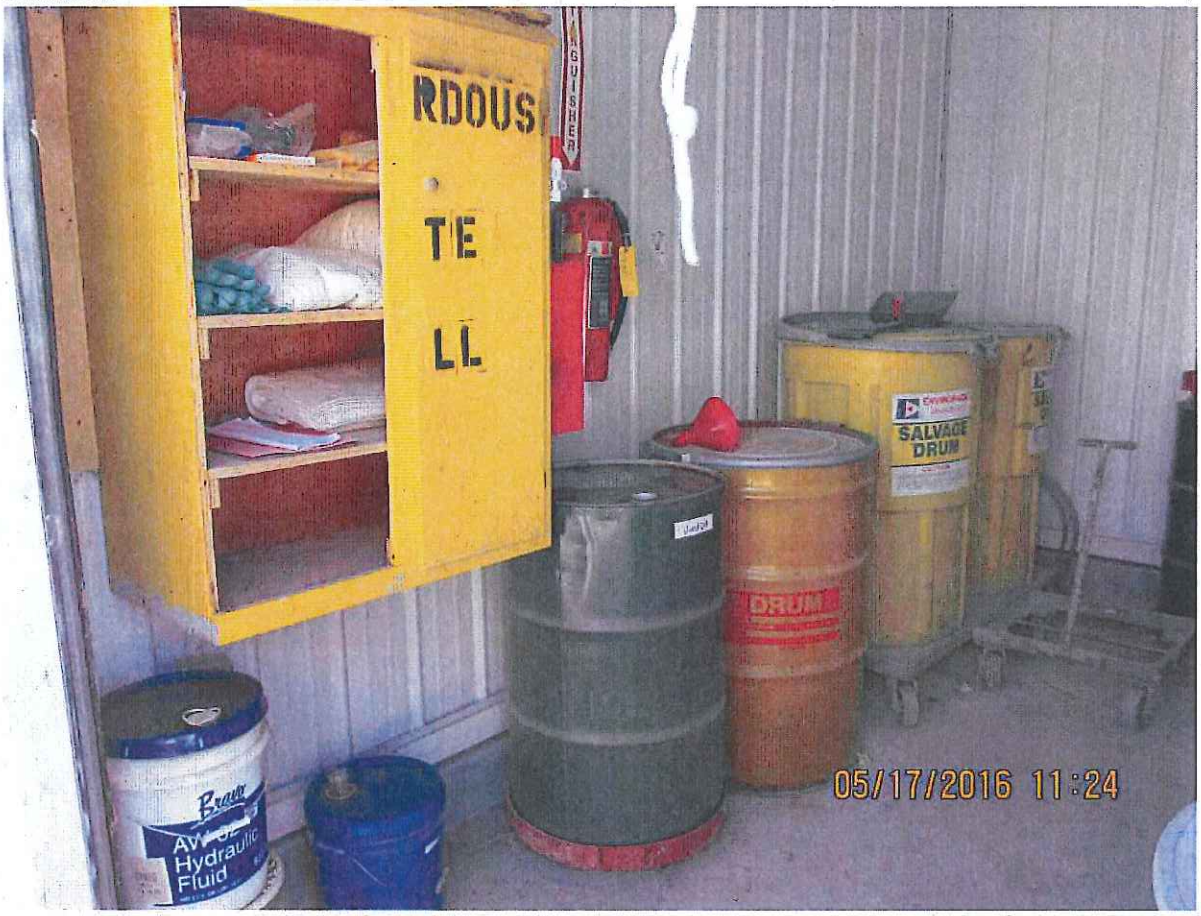

RDOUS
TE
LL
SALVAGE DRUM
DRUM
Hydraulic Fluid
05/17/2016 11:24

Photo 10:

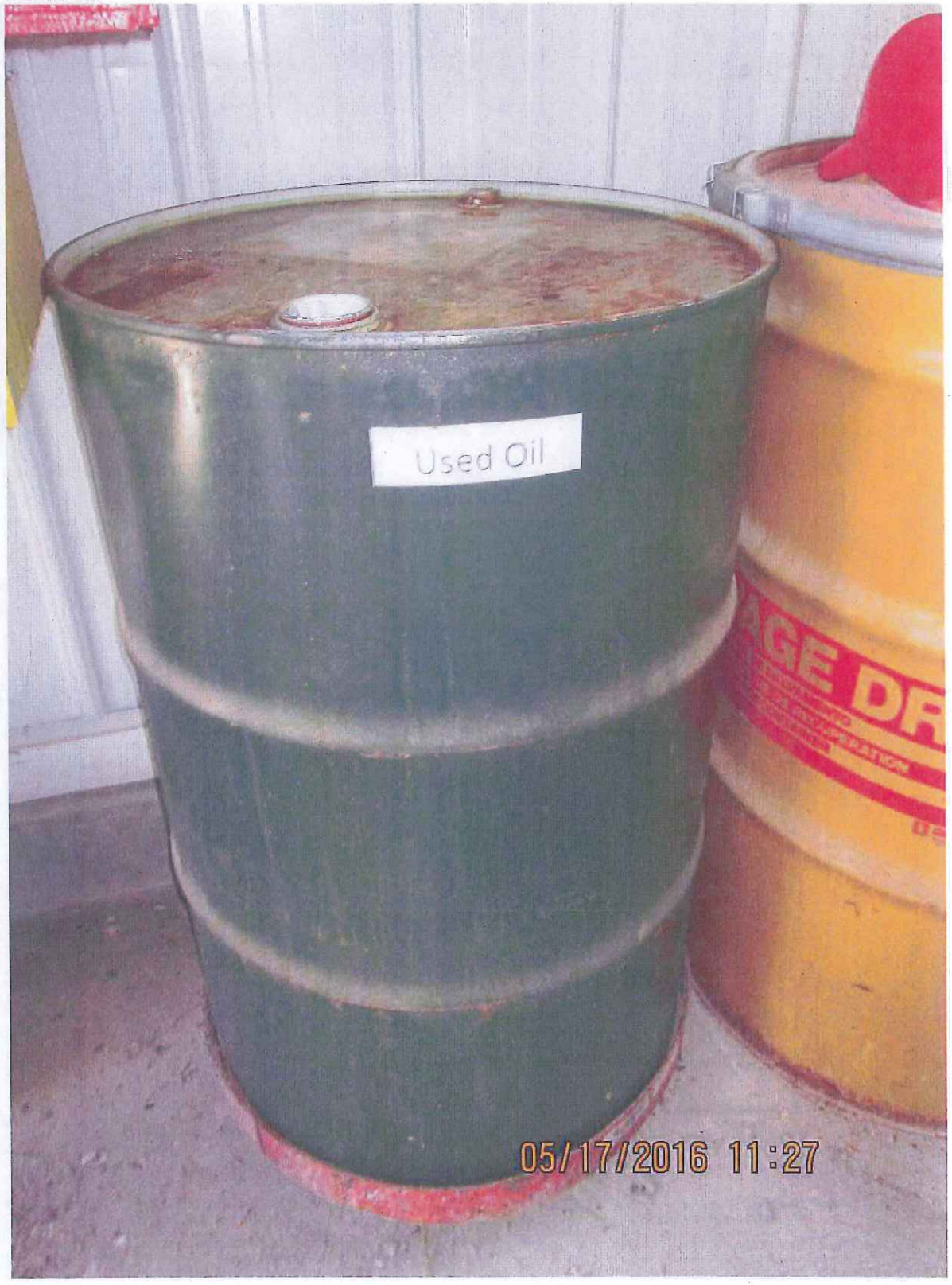


Photo 11:

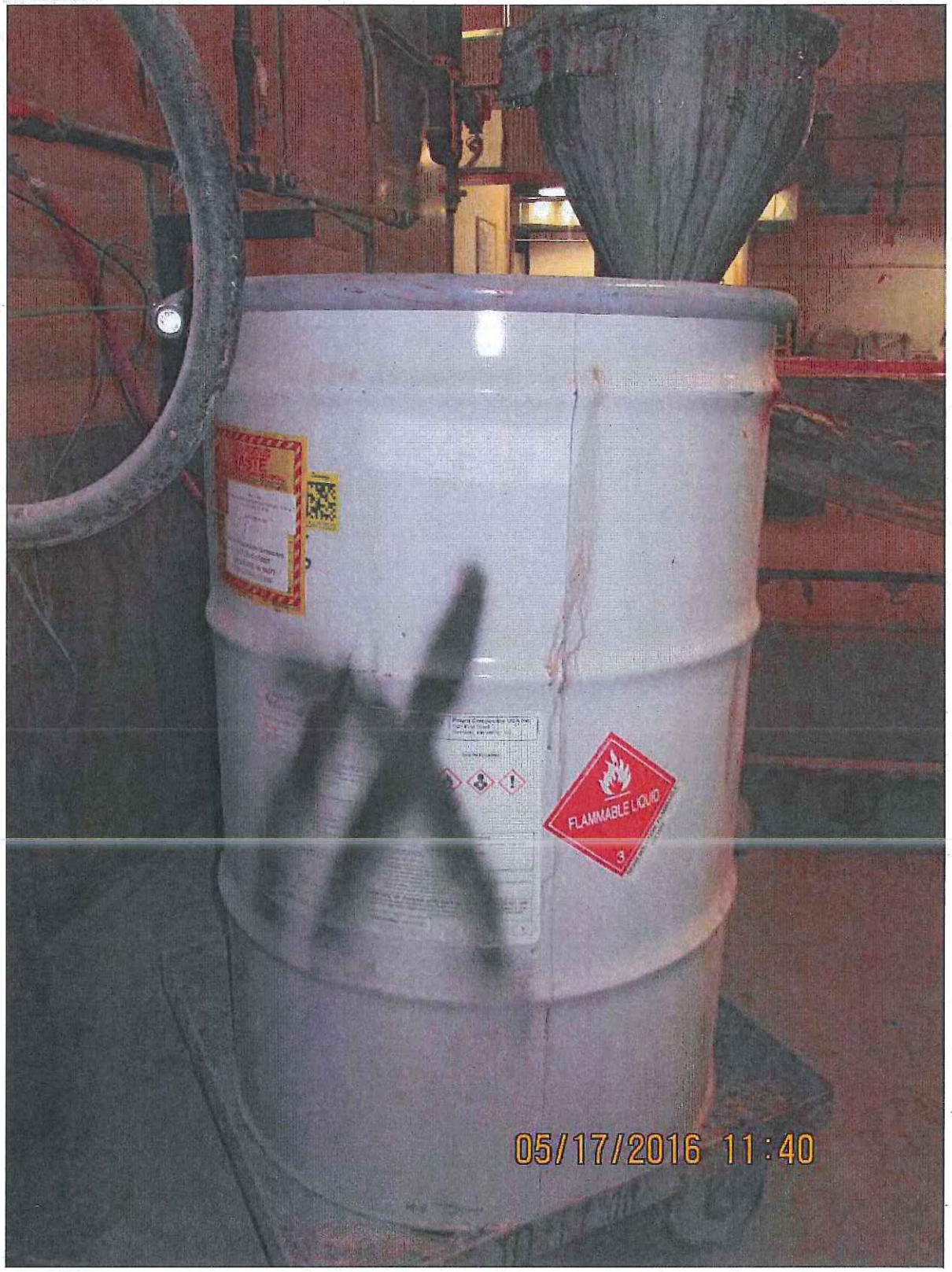


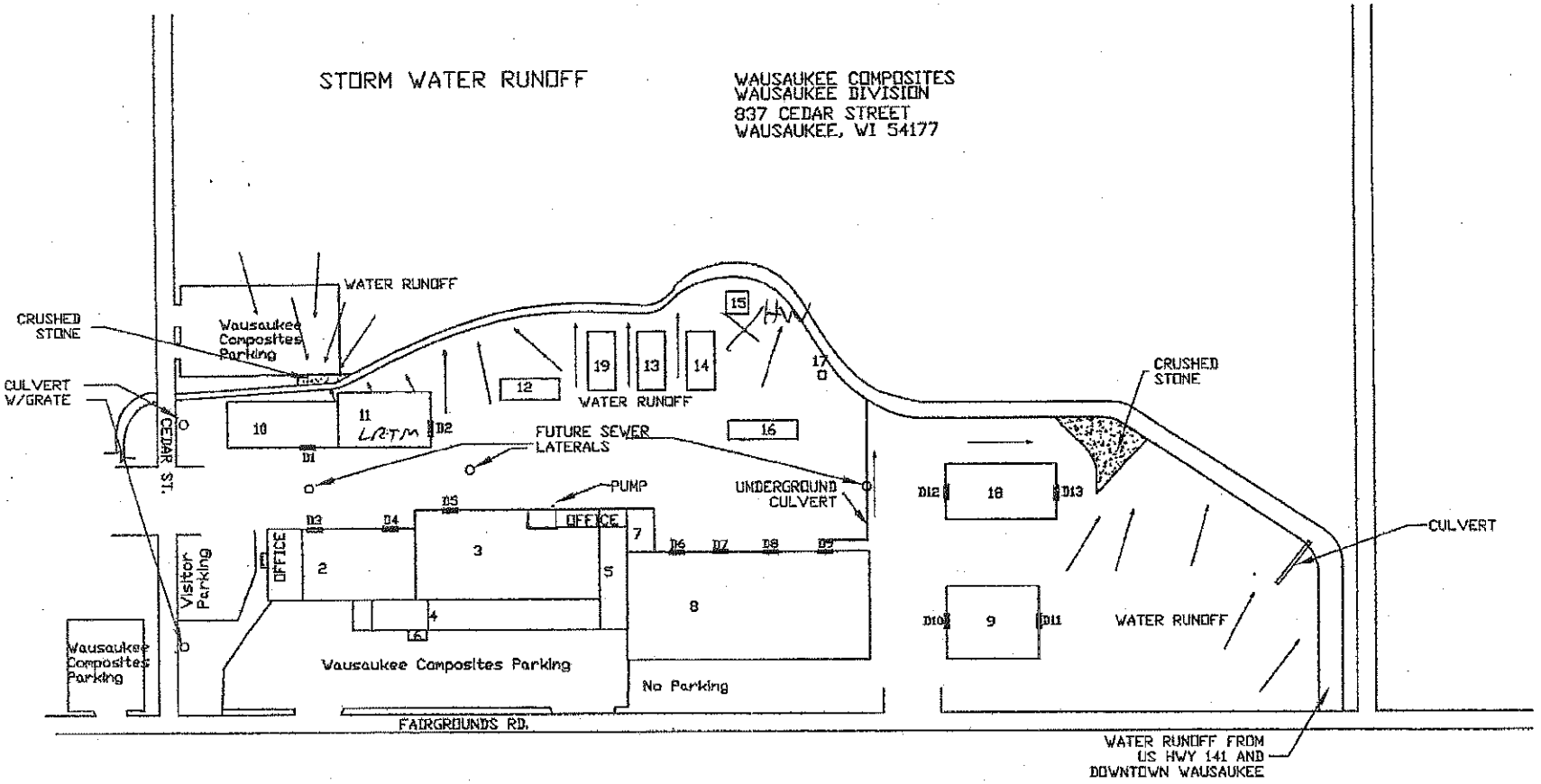
Photo 12:

Photo 13:

ATTACHMENT B: Facility Diagram

STORM WATER RUNOFF

WAUSAUKEE COMPOSITES
WAUSAUKEE DIVISION
837 CEDAR STREET
WAUSAUKEE, WI 54177



ATTACHMENT C: Employee Training Records

Wausaukee Composites, Inc.

Training History by Course

COURSE Hazardous Chemical Train
CODE HAZ CHEM
TYPE None Specified
CERTIFICATION None Specified

CREDITS 0.00
CEU 0.00

SESSIONS 1
HOURS 0.00

EMPLOYEE NAME	EMPLOYEE ID	JOB TITLE	DEPARTMENT	COST CENTER	END DATE	JOB REL	GRADE
Belongia, Scott J	0245	Transportation Team	034	0	10/09/2008	No	
Belongia, Scott J	0245	Transportation Team	034	0	10/06/2009	No	
Belongia, Scott J	0245	Transportation Team	034	0	10/07/2010	No	
Belongia, Scott J	0245	Transportation Team	034	0	10/12/2011	No	
List, Sr., Keith M	0993	Warehouse	034	0	10/09/2008	No	
List, Sr., Keith M	0993	Warehouse	034	0	10/06/2009	No	
List, Sr., Keith M	0993	Warehouse	034	0	10/07/2010	No	
List, Sr., Keith M	0993	Warehouse	034	0	10/12/2011	No	
Suzawith, Scott T	1047	Maintenance Team	032	0	10/09/2008	No	
Suzawith, Scott T	1047	Maintenance Team	032	0	10/06/2009	No	
Suzawith, Scott T	1047	Maintenance Team	032	0	10/07/2010	No	
Suzawith, Scott T	1047	Maintenance Team	032	0	10/12/2011	No	
Vanden Elzen, Gerald J	1214	Packaging	033	0	10/09/2008	No	
Vanden Elzen, Gerald J	1214	Packaging	033	0	10/06/2009	No	
Vanden Elzen, Gerald J	1214	Packaging	033	0	10/07/2010	No	
Vanden Elzen, Gerald J	1214	Packaging	033	0	10/12/2011	No	

Total Employees 16
Completed 16

COURSE Hazardous Waste Training
CODE RCRA
TYPE Seminar
CERTIFICATION None Specified

CREDITS 0.00
CEU 0.00

SESSIONS 1
HOURS 14.00

EMPLOYEE NAME	EMPLOYEE ID	JOB TITLE	DEPARTMENT	COST CENTER	END DATE	JOB REL	GRADE
Verdegan, John M	0165	Dir. of Manufacturing	075	0	01/13/2010	No	

Wausaukee Composites, Inc.

Training History by Course

Total Employees	1
Completed	1

Certificate of Training

Presented to

Geoff Pfahl

For the successful completion of the 40 CFR 264/265.16 (NR664/665.0016) Personnel Training

- Generator Standards
- Identification and Listing of Hazardous Waste
- Selecting a TSDF
- New Legal Developments
- Universal Waste
- Planning, Preparedness and Training
- Inspections

Presented by

Federation of Environmental Technologists, Inc.

Annual RCRA Refresher
Completed on May 20, 2015 in Milwaukee, WI

Tracy Pellicori

Tracy Pellicori, Program Chair

Certificate of Training

Presented to

Geoffrey Pfahl

For the Successful Completion of the

Hazardous Waste Refresher 1910.120(q) (29 CFR 1910.120 & 29 CRF 1926.65)

- HazWoper Overview of OSHA Standard
- Hazardous Materials Chemistry
- Ergonomic and Physical Hazards
- Confined Space Entry
- Personal Protective Equipment/ Work Zones
- Workplace Emergencies
- Planning for a Spill
- Training Checklist

Presented by

Wisconsin Chapter of the Certified Hazardous Materials Managers and
the Federation of Environmental Technologists, Inc.

Completed on March 27, 2014 in Brookfield, WI

Robert Evangelisti, Program Chair

Certificate of Training

Presented to

Keith List

For the Successful Completion of the

Hazardous Waste Refresher 1910.120(q) (29 CFR 1910.120 & 29 CRF 1926.65)

- HazWoper Overview of OSHA Standard
- Hazardous Materials Chemistry
- Ergonomic and Physical Hazards
- Confined Space Entry
- Personal Protective Equipment/ Work Zones
- Workplace Emergencies
- Planning for a Spill
- Training Checklist

Presented by

Wisconsin Chapter of the Certified Hazardous Materials Managers and the Federation of Environmental Technologists, Inc.

Completed on March 27, 2014 in Brookfield, WI

Robert Evangelisti, Program Chair

Certificate of Training

Presented to

Scott Belongia

For the successful completion of the 40 CFR 264/265.16 (NR664/665.0016) Personnel Training

- Generator Standards
- Identification and Listing of Hazardous Waste
- Selecting a TSDF
- New Legal Developments
- Universal Waste
- Planning, Preparedness and Training
- Inspections

Presented by

Federation of Environmental Technologists, Inc.

Annual RCRA Refresher
Completed on May 20, 2015 in Milwaukee, WI

Tracy Pellicori

Tracy Pellicori, Program Chair

FET - Federation of Environmental Technologists, Inc.
Educating and Developing Excellence in Environmental Professionals

June 16, 2015

Scott Belongia
Sintex Wausaukee Composites
837 Cedar St
Wausaukee, WI 54177

Dear Scott:

This certifies that Scott Belongia has been given 6.0 hours for attendance at the **"Hazardous Waste Training Seminar – RCRA Refresher"** on Wednesday, May 20, 2015 in Milwaukee, WI to be applied toward CHMM CMP hours.

Barbara Hurula, ED
Barbara Hurula
FET Executive Director

W175N11081 Stonewood Dr #203, Germantown WI 53022 • 262-437-1700 • Fax 262-437-1702 • info@fetinc.org • www.fetinc.org

FET - Federation of Environmental Technologists, Inc.
Educating and Developing Excellence in Environmental Professionals

June 16, 2015

Scott Belongia
Sintex Wausaukee Composites
837 Cedar St
Wausaukee, WI 54177

Dear Scott:

This certifies that Scott Belongia has been awarded 6.0 hours (0.6 CEU) of continuing education credit for attendance at the **"Hazardous Waste Training Seminar – RCRA Refresher"** on Wednesday, May 20, 2015 in Milwaukee, WI.

Barbara Hurula
FET Executive Director

W175N11081 Stonewood Dr #203, Germantown WI 53022 • 262-437-1700 • Fax 262-437-1702 • info@fetinc.org • www.fetinc.org

FET - Federation of Environmental Technologists, Inc.
Educating and Developing Excellence in Environmental Professionals

June 16, 2015

Scott Belongia
Sintex Wausaukee Composites
837 Cedar St
Wausaukee, WI 54177

This certifies that Scott Belongia attended **"Hazardous Waste Training Seminar – RCRA Refresher"** on Wednesday, May 20, 2015 in Milwaukee, WI.

This event contains 6.0 hours and may be eligible for ABIH CM credit.

ABIH Diplomates should calculate the CM credit based on their participation. See ABIH web site for CM credit criteria.

Barbara Hurula
FET Executive Director

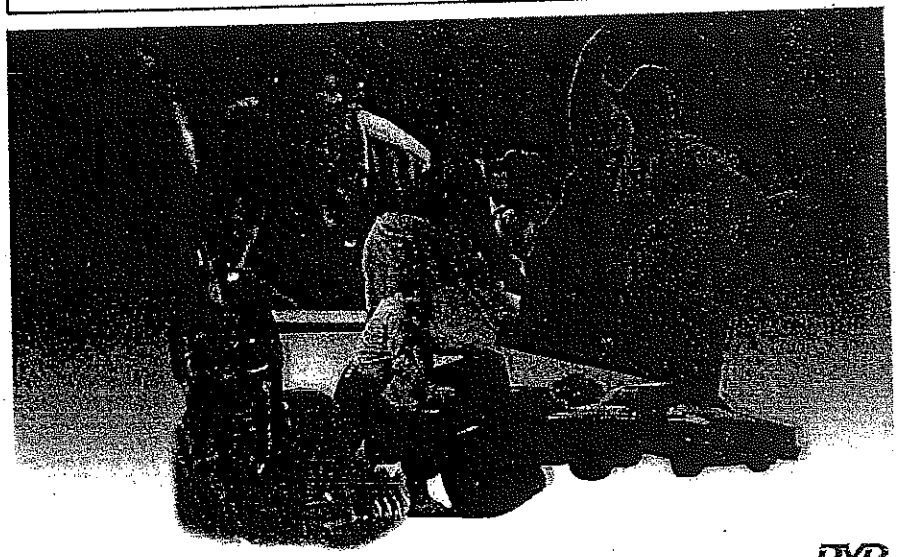
W175N11081 Stonewood Dr #203, Germantown WI 53022 • 262-437-1700 • Fax 262-437-1702 • info@fetinc.org • www.fetinc.org

AUDIO-VISUAL

PICTURES

RCRA Training for Hazardous Waste Generators

4036-E



DVD

AURORA

PICTURES

It Only Takes A Second

3019-E

DVD

PICTURES

Dealing With Hazardous Spills

3395-E

DVD

ATTACHMENT D: Emergency Response Plan

WAUSAUKEE COMPOSITES

WAUSAUKEE
COMPOSITES
ISO 9001:2000 Certified

INCORPORATED

837 Cedar Street
Wausaukee, WI 54177
Phone: 715-856-6321
Fax: 715-856-5567

EMERGENCY RESPONSE PLAN

CORPORATE POLICY STATEMENT

Wausaukee Composites, Inc. Hazmat Team has the unrestricted authority to immediately and decisively respond to any condition that threatens the health and safety of our employees and/or facility, community or the environment including contacting the proper government agencies and authorities. The Hazmat Team may direct on-site activity including the direction to cease production operations, evacuate the facility, and contract with outside agencies for remedial action.

Rev. 3 01/04/2065
Rev. 4 01/06/2010
Rev. 5 03/29/2012

Wausaukee
Composites, Inc.

Memorandum

To: *Jack Verdegan, Scott Suzawith*
From: Edward Trueman
Date: March 29, 2012
Subject: Emergency Response Activity

4/10/2012

Be advised that as "Facility Emergency Response Coordinators" you have the authority to immediately respond to any condition which threatens the health and safety of our facility, our employees, the community, and/or the environment by contacting the appropriate local, state, and national response centers. You may direct on-site containment activity, and such other response activities as are deemed necessary and appropriate including the order to cease operations and evacuate the facility.

Edward Trueman
President / CEO

Reviewed and Understood

Jack Verdegan — 4/10/12
Jack Verdegan — *Date*
Emergency Response Coordinator and Site Commander

Scott Suzawith — 4-30-12
Scott Suzawith — *Date*
Emergency Response Coordinator

Wausaukee
Composites, Inc.

Memorandum

To: *Jack Verdegan*
From: Joseph McKindles
Date: March 29, 2012
Subject: Emergency Response Activity

Be advised that as "Emergency Response Coordinator" you have the unrestricted authority to immediately and decisively respond to any condition that threatens the health and safety of our employees and/or facility, the community, or the environment including contacting the proper government agencies and authorities. You may direct on-site activity including the direction to cease operations and evacuate the facility.

Joseph McKindles
COO / CFO Executive Vice-President

Reviewed and Understood

Jack Verdegan — 4/10/12
Jack Verdegan *Date*
Emergency Response Coordinator and Site Commander

EMERGENCY RESPONSE PLAN

I. Description of the Facility

Wausaukee Composites Incorporated is a small business involved in the custom manufacturing of fiberglass products servicing five major industries. These components are manufactured primarily from polyester resins. These resins are transported by 40,000 pound tanker trucks and by tractor trailers in drums. This material is stored in two 5,000 gallon bulk storage tanks with a moat system. The 55 gallon drums are stored in an outside warehouse.

The employees are organized by department and by product lines. Each of the nine production departments has resin stored in their respective areas.

Emergency situations identified at the facility include:

A. Chemical Spill
B. Explosion/Fire
C. Windstorm/Tornado

II. Purpose

In accordance with 29 CFR 1910.120 (P) (8) the following plan is designed to minimize or prevent damages to human health and the environment in the event of an unplanned sudden or non-sudden release of hazardous material within the plan perimeter. It is understood that provisions of this plan must be carried out immediately when such an event or occasion would necessitate an immediate response.

III. Pre-Emergency Planning and Coordination

The following procedures describe the actions Wausaukee Composites Incorporated personnel must take in order to ensure compliance with 29 CFP 1910.120 (P) in response to an emergency. Arrangements have been made to coordinate the emergency plan and emergency services, with the Wausaukee Fire Department, Marinette County Police, Bay Area Medical Center, Wausaukee Rescue-Squad, and Marinette County Emergency Government Committee.

A copy of the emergency plan and all revisions will be maintained at Wausaukee Composites Incorporated's main office area. Copies will be distributed to the Wausaukee Fire Department, Marinette County Police, Bay Area Medical Center, Wausaukee Rescue Squad, and the Marinette County Emergency Government Committee.

The emergency plan will be reviewed and immediately amended whenever:

A. Applicable regulations are revised.
B. The plan fails in the event of an emergency.
C. Wausaukee Composites Incorporated changes the design, construction, operation, maintenance, or other circumstances that may increase the potential for fires, explosions or releases of hazardous materials, or changes in the response necessary in an emergency.
D. The list of emergency coordinators changes.
E. The list of emergency equipment changes.

EMERGENCY RESPONSE PLAN (CONT)

IV. Personnel

Wausaukee Composites Incorporated has personnel on site 24 hours/day, 5/days/week, the entire year. All office and maintenance personnel are aware of the emergency coordinators in the emergency plan as well as all emergency procedures.

The primary and alternate emergency coordinator are thoroughly familiar with all aspects of the facility emergency plan, all operations, and activities at Wausaukee Composites Incorporated, the location and characteristics of hazardous material, the location of all records within the facility, and the facility layout.

The Emergency Response Team for Wausaukee Composites Incorporated consists of:

A. Incident commanders (1) alternates (1)
B. Technician Level (4)
C. Operations Level (5)

The incident commander/coordinator and alternates will be trained at the on scene level. Responsibilities of the incident commander/coordinator are attached to this policy.

Wausaukee Composites Incorporated will note in the operating record: the time, date, and any details of any incident that requires implementing the emergency plan. This report will include:

A. Name, address, and telephone number of the owner.
B. Name, address, and telephone number of the facility.
C. Date, time, and type of incident.
D. Name and quantity of material(s) involved.
E. Extent of injuries.
F. Assessment of actual or potential hazards to human health or the environment.
G. Estimated quantity and disposition of recovered material(s).

V. Communication

The incident coordinator is in charge of all communication while the incident is under the sole control of the plan personnel. When outside help is sought, the plant incident coordinator assumes the role of direct responsibility to the incident.

A. Internal Communication
The internal communications will be conducted using the Wausaukee Composites Incorporated phone system and hand-held two way radios. In the event of an emergency, Line 1 will be used to communicate with outside agencies as required.

EMERGENCY RESPONSE PLAN (CONT)

The following are the primary and alternate emergency coordinator for Wausaukee Composites Incorporated, their name, title, home address, business phone number, and home phone number is listed below:

Jack Verdegan – Director of Operations
N18150 Lily Lake Road
Dunbar, WI 54119
715-856-6321 Ext. 237 – Business
715-324-5788 – Home

Scott Suzawith – Maintenance Team Leader
W7792 Amberg Wausaukee Road
Wausaukee, WI 54177
715-856-6321 Ext. 242 – Business
715-759-5054 – Home

B. External Communication
The incident coordinator is in charge of all communication until additional personnel are called. Communication with outside personnel is the sole responsibility of the coordinator (or his/her designee). The following may be called:

Wausaukee Fire Department – 911

Bay Area Medical Center – 715-735-6621

Chemtrec (Transportation) – 800-424-9300

Department of Natural Resources – 715-732-0101

Marinette County Hazmat Team 715-856-5179 (or 911)

Marinette County Sheriff – 715-735-7600 (or 911)

Northeast Regional Hazard Team: National Response Center – 800-424-8802

Wisconsin Emergency Management – 800-943-0003

Marinette Emergency Management – 715-732-7660

When making a call, include the following information:
A. Identify yourself
B. State the exact location
C. Describe the emergency
D. Give names of people involved
E. Give areas potentially affected

EMERGENCY RESPONSE PLAN (CONT)

VI. Lines of Authority

If the incident response is limited to plan personnel, the incident coordinator has overall responsibility for all actions. Personnel should check with the incident coordinator before undertaking any actions not ordered by him/her.

VII. Training

Individual members of the emergency response team will receive training as specified in 1910.120 (Q). In addition, all emergency response employees will receive four (4) hours of training annually to updated Hazard Communication Training (1910.1200).

VIII. Fire

Whenever the fire alarm sounds (buzzer), all non-supervisory personnel must evacuate the facility immediately. After exiting the building, proceed quickly to the consolidation area (Fairgrounds). Do not re-enter the building until an "all clear" condition has been established, and the coordinator has verified conditions are suitable for re-entry.

IX. Chemical Accidents

Recognition of a release of resin/gelcoat will be generally the result of a visual observation of a leak. All material handling and maintenance personnel have been told to report any suspected leak to the team leader immediately.

Maintenance to the bulk resin system is conducted only after pumps have been disengaged and lockout conducted by maintenance team leader. All maintenance activities are conducted according to the Standard Operating Procedure (SOP), which includes sections on the building, systems, and confined space entry procedures. All maintenance personnel receive annual training in the safety practices pertinent to resin/gelcoat handling.

A. Evacuations

Any time the buzzer sounds all non-supervisory personnel must report immediately to the fairgrounds directly north of the plant. Team leaders will secure their areas per pervious training and then report to the fairgrounds in the area north of the plant.

B. Non Evacuations

All personnel will follow the direction of the incident coordinator.

C. Site Security and Control

Site security and control is the responsibility of the incident coordinator and the security officer based on the contents of the emergency.

EMERGENCY RESPONSE PLAN (CONT)

X. Evacuation Routes and Procedures

Whenever a need arises to evacuate any area of the facility, all employees in that area shall proceed to the nearest exit after hearing the firm alarm. It shall be each employee's responsibility to be completely aware of the exit plan for those areas in the facility in which he or she works. The safety officer shall collect head count information from team leaders of all employees at the fairground area. Only when the "all clear" signal is given, (via the paging system), and verified by the incident coordinator shall employees be allowed to re-enter the facility.

All doors are clearly marked exit and an exit plan is posted by each door exit.

The consolidation area is the fence area directly north of the employee parking lot on the north side of the facility. Upon regrouping, each team leader shall complete a head count to forward to the safety officer. It is imperative that all personnel go directly to the consolidation area so this information can be forwarded to the fire department upon arrival. All employees are asked to stay in the consolidation area until instructed otherwise (map attached).

The warehouse team leader will immediately Marshall all fork lift trucks in front of building 19 and 13 and man these units with trained operators (assuming this is not life threatening). These units will stand by to aid in the containment process by relocating materials as necessary to prevent further expansion of the fire to aid fire-fighting personnel upon request.

Supervisory personnel will verify all employees have evacuated their area and immediately evacuate. In the event that alarms sound on the weekends, at nights, or on holidays, the system automatically calls incident coordinators at their homes for verification of a problem.

A. False Alarms

False alarms do occur; often, they are the result of power failures or pressure drops. However, should the alarm be triggered accidentally, the maintenance team leader will contact the proper authorities to explain.

B. Fire Prevention

In order to minimize the potential for fire, the following SOPs have been developed:

1. Acetone use has been minimized.
2. Where acetone is used, all containers must be grounded.
3. No smoking in the plant has been adopted, except in designated area.
4. Fire suppression system is tested weekly.
5. Employees are trained annually on the fire protection.

EMERGENCY RESPONSE PLAN (CONT)

XI. Decontamination

All emergency apparatus (brooms, shovels, temporary dikes, etc.) will be rinsed on-site and washed in a tub (20-30 gallon) several times with polycarbonate. Once complete all apparatus will be rinsed with warm detergent water and placed on a rack for drying. Fire extinguishers will be sent out for refilling and air-purifying respirators will be sponged with isoprophy alcohol.

All personnel gloves (inner and outer), hats, boots, coveralls, and coats will be placed in plastic bags and discarded in sealed drums for proper disposal.

XII. Emergency Medical Treatment and First Aid

A. One person on each shift is trained in first aid/CPR. The first responder and team leader are authorized to decide whether first aid is insufficient.

B. Wausaukee Composites Incorporated is located approximately 40 miles from Bay Area Medical Center. However, Wausaukee rescue squad is located 0.5 miles from Wausaukee Composites Incorporated and can respond in 5 minutes.

XIII. Emergency Alerting and Response

Emergency situations may arise at any time and in any location within Wausaukee Composites Incorporated. In an emergency or disaster, all employees must handle the situation as calmly and promptly as possible. Emergencies will generally be in the nature of spills, fires, or explosions, which could result in the spread of hazardous material. Since it is not possible to devise a set of rules or procedures to govern all possible emergencies, the following candidates are presented only as a guide to aid the user in establishing more specific emergency procedures applicable to his/her conditions.

The team leader and the incident coordinator should be notified immediately. If neither can be reached or the emergency is of such nature as to request outside help, immediately call one of the following numbers:

Emergency Description	Contact for Assistance	Telephone #
Injury or severe sudden illness	Wausaukee Rescue Squad	911
Fire or Explosion	Wausaukee Fire Dept.	911
Accidental Release of Hazardous Waste	Front Office	Extension 221
Extensive Building Damage	Marinette Sheriff Dept.	715-735-3009 or 911

Then:

A. Identify yourself to the person who answered
B. State the exact location of the emergency, either in the facility itself or on the ground
C. Describe briefly and calmly the nature of the emergency
D. Give the name(s) of the person(s) involved

During an emergency, alertness and prompt action by the employees present at the facility will help prevent further injury or property damage.

XIV. Fire Emergency

The fire alarm system is an automatic/manual pull network consisting of automatic sprinklers and flow or pressure drop sensors, manual pull boxes and alarm bells. A notifier is connected directly to the fire department with a system control box.

A. Activation

The alarm may be triggered in any of the following ways:

1. Any flow or pressure drop in the system automatically trips the alarm
2. The alarm may be activated manually by use of any pull box
3. Through the notifier box (located in the main office), the fire department is alerted any time that the alarm system is activated. They are required to respond and will do so shortly after the alarm sounds.

B. Deactivation

The alarm may be silenced after the arrival of the fire department by switching the toggle switch on the lower left-hand side of the control panel.
Then push alarm silence button and the trouble silence button to off.

C. Reactivation

To reactivate the alarm system, go to the control panel (front office) push detector reset button then push the annuncihator reset button. Once complete, the system will go on line providing water pressure has been restored.

XV. Critique of Response and Follow Up

A thorough investigation is required to ensure the adequacy of procedures and to identify needed changes in the Response Plan.

Immediately upon completion of the termination procedures, a debriefing will be conducted with all department personnel and any outside agencies. A meeting will be called by the emergency coordinator who will make a full report to the COO/CFO Executive Vice-President. This reporting requirement will also include an abatement plan and will be forwarded to the proper regulatory agencies. Sections of the report will include:

A. Description of the Emergency
B. Diagram
C. Personnel responding and Roles
D. Material Released – Identity and Quantity
E. Environmental Measurements
F. Zones
G. Site Security Operations
H. Injuries/Health Effects
I. Actions/Events Contributing to the Emergency
J. Required Follow Up Action

EMERGENCY RESPONSE PLAN (CONT)

XVI. Emergency Response and Personnel Protection

Personnel protection and emergency response procedures have been established at Wausaukee Composites Incorporated for response to emergency situations. Both the fixed and portable safety apparatus to be used for most emergency conditions are found in the hazard communications procedure.

A general listing of the safety equipment available at the facility includes:

A. Safety showers
B. Eye wash stations
C. Spill control cart (protective gloves, absorbents, etc.)
D. Respirators
E. Gloves
F. Safety glasses
G. First aid supplies (kits and cabinets)
H. Fire extinguishers

XVII. Emergency Response

A. Small spills

For small spills, a mobile cart has been assembled which contains (2) 55 gallon overpacks (drums) with accompanying shovel, tools, and absorbents. Persons using the spill cart will be properly attired with neoprene boots, chemical resistant suit, goggles, and air purifying respirators. Personnel using this equipment have been trained in safety equipment standard operating procedures. This cart is located in building 16.

After proper protective attire has been donned, absorbent will be placed on the spill. The contaminated absorbent will then be shoveled into a receiving (overpack) drum. The drum, containing the absorbed substance, will be secured into the hazard storage area and labeled properly.

Following the absorbing procedure, the area where the spill has occurred will be washed with detergent and rinsed three times with water. The run off will be collected, analyzed and if non-hazardous, discharged into the floor drain.

In the event that toxic vapors, mists or fumes are released into the air as a secondary hazard, the vapors will be settled by spraying a fine water mist into the air with a hose. The collected fluid will be analyzed and if non-hazardous, discharged through the floor drain.

All equipment used to clean up a spill will be washed thoroughly with water. The water from this rinsing will also be collected and analyzed. If it is non-hazardous, it can be discharged into the floor drain. All clothing will be bagged and considered hazardous waste. This waste must be shipped to an appropriate hazard waste disposal facility.

EMERGENCY RESPONSE PLAN (CONT)

B. Large spills

For large spills such as rupturing of one of the bulk holding tanks exceeding the moat area, an outside emergency response team will be contacted. Both the emergency response teams from the fire department and the National Response Center (NRC) would be contacted at 1-800-424-8802 or 202-426-2675. This notice will include:

1. Name and phone number of reporter
2. Name and address of carrier
3. Date, time and location of incident
4. Extent of any injuries
5. Hazard class, name and quantity of hazard material involved
6. Type of incident and nature of materials involved

A company with the capabilities of initiating remedial actions is:

REI Engineering, Inc.
4080 North 20th Avenue
Wausau, WI 54401
PH: 715-675-9784 or 877-REI-7745

The aforementioned company telephones are operated 24 hours a day. The emergency coordinator will call the company and describe the incident. The company will immediately send an advance team to assess the problem and decide what equipment is needed. The following persons have the authority to commit funds to initiate remedial action:

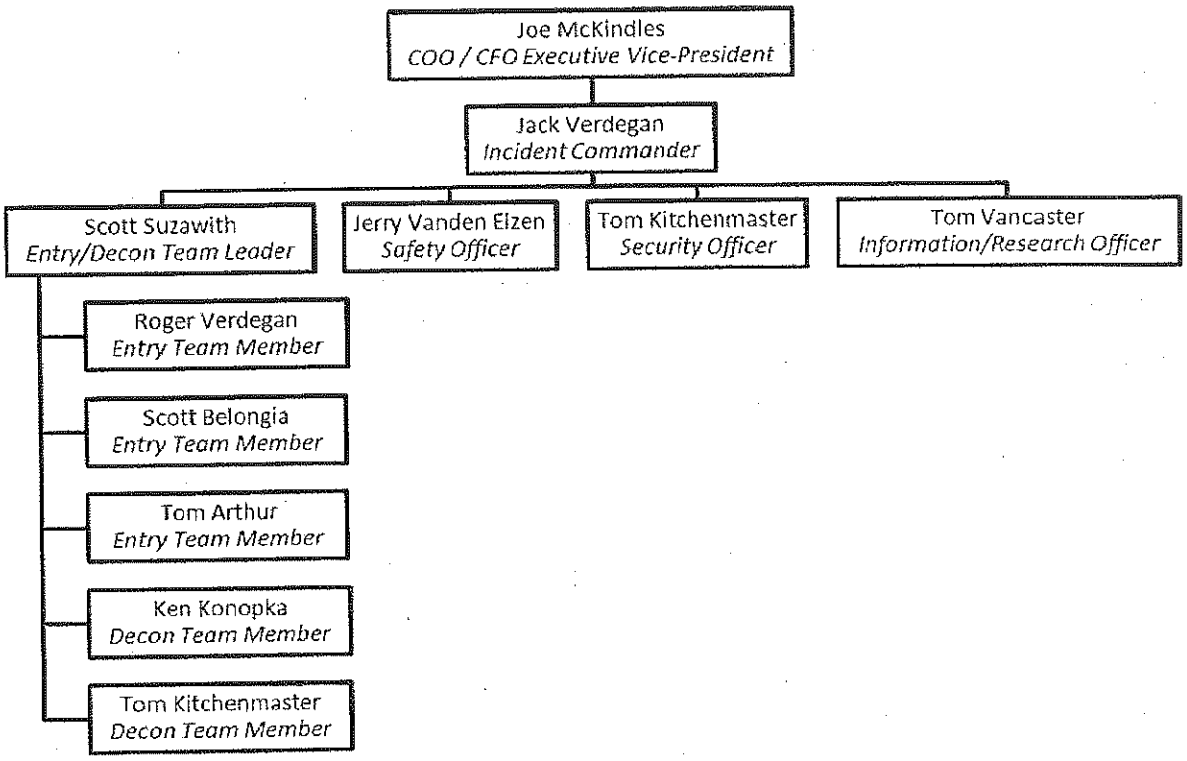
A. Jack Verdegan (primary)
B. Scott Suzawith (alternate)
C. Tom Kitchenmaster (alternate)

Also, the Chemical Manufacturers Association (CMA) maintains a public service center in Washington D.C. under the title of the Chemical Transportation Emergency Center (Chemtrec). The toll free number is 1-800-424-9300 and is available 24 hours a day.

Should a major spill or tank rupture occur, the containment and drainage is of primary concern. Mechanical plugs are not required, as there are no floor drains in the bulk resin storage area.

In the event that a spill becomes a major catastrophe with ensuing fire/explosion and/or release of toxic fumes and vapor, it may become necessary for the incident coordinator to have the building evacuated (in accordance with our standard evacuation procedures) and the facility shut down. The main power supply will be turned off at the direction of the incident coordinator.

Wausaukee Composites Incorporated
Emergency Response Team



Contact Name	Phone Number
Arthur, Tom	Home: 715-927-2411
Bay Area Medical Center	**715-735-6621**
Belongia, Scott	Home: 715-324-5110
Emergency "Spill" Contacts	
Chemtrec	**800-424-9300**
Dept. of Natural Resources*	**800-943-0003**
Kitchenmaster, Tom	Home: 715-854-3452
Konopka, Ken	Home: 715-854-7664
Marinette County Emergency Management	**715-732-7660 or 911**
Marinette Co. Hazmat Team (Marinette FD)	**911**
Marinette County Sheriff	**715-735-3309 or 911**
McKindles, Joe	Home: 906-776-1809
National Response Center	**800-424-8802**
Suzawith, Scott	Home: 715-759-5054
Vancaster, Tom	Home: 715-856-5002
Vanden Elzen, Jerry	Home: 715-854-3566
Verdegan, Jack	Home: 715-324-5788
Verdegan, Roger	Home: 715-324-5685
Wausaukee Fire Dept.	**911**
Wisconsin Emergency Management (WEM)*	**800-943-0003**

*WEM and DNR share a 24 hour emergency 800 notification number.

INCIDENT COMMANDER

(Job Description)

The incident commander is responsible for incident activities including the development and implementation of strategic decisions and for approving the ordering and releasing of resources.

- Obtain incident briefing and Incident Briefing Forms from prior incident commander
- Assess incident situation
- Conduct initial briefing
- Activate elements of the incident command system
- Brief command staff and section chiefs
- Insure planning meetings are conducted
- Approve and authorize implementation of incident action plan
- Determine information needs and inform command personnel of needs
- Coordinate staff activity
- Manage incident operations
- Approve requests for additional resources and requests for release of resources
- Authorize release of information to news media
- Insure Incident Status Summary is completed and forwarded to Operations Coordination Center and dispatch center
- Approve plan for demobilization

ENTRY/DECON TEAM MEMBERS

(Job Description)

The entry/decon team members shall perform all duties assigned by the team leader/coordinator consistent with training at the operations level.

- Use of all provided personal protective equipment
- Basic control, containment and/or confinement measures
- Follow basic decon procedures
- Participate in the standard operating procedures (SOP), termination process and basic hazard and risks assessment techniques

ATTACHMENT E: Inspection Checklist

Sintex - Wausaukee Composites WID980904684 5/17/2016 BK

SMALL QUANTITY GENERATOR INSPECTION

Revision: 02/12/2015
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate between 100 kg (220 lbs) and 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month and less than 1 kg of acute hazardous waste in a calendar month , evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated (NR 662.011).	✓	662.190(2)
B. The waste determination has been made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used (NR 662.011(3)).	✓	662.190(2)
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers (NR 662.011(3)(a)1).	✓	662.190(2)
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	✓	662.193(1)(b)
E. Generator submitted a notification form and obtained an EPA ID# (NR 662.012). Note: A subsequent notification should be submitted when there is an ownership or name change.	✓	662.190(2)

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator sends waste off-site to be reclaimed under a contractual agreement. If NO, go to Question 2.E.	NA	
B. Type of waste and frequency of shipments are specified in the contractual agreement.		662.191(1)(a)
C. Vehicle used to transport the waste to the recycler and back to the generator is owned and operated by the reclaimer.		662.191(1)(b)
D. Copy of the reclamation agreement is maintained for at least 3 years from the date the agreement is terminated or expires.		662.191(2)
E. Generator sends hazardous waste off-site that is not reclaimed under a contractual agreement. If NO, go to Question 2.K.	✓	
F. The manifest is used according to the instructions in the appendix to 40 CFR part 262 (NR 662.020(1).	✓	662.190(2)(a)
G. The facility designated on the manifest is permitted or licensed to accept the waste (NR662.020(2)).	✓	662.190(2)(a)
H. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility (NR 662.023(3)).	NA	662.190(2)(a)
I. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262 (NR 662.020(1)).	NA	662.190(2)(a)
J. If the generator received a shipment back as a rejected load, the returned waste has been accumulated in compliance with the container or tank standards for less than 180 days.	NA	662.192(5)
K. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	NA	662.192(5)

SMALL QUANTITY GENERATOR INSPECTION

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

L. Copy of the manifest is signed by the generator and retained until the signed copy from the designated facility is received.	✓	662.193(1)(a)
M. Copy of each manifest is kept for at least three years from the date of shipment.	✓	662.193(1)(a)
N. Hazardous waste is packaged according to applicable DOT requirements before transport (NR 662.030).	✓	662.190.(2)
O. Hazardous waste is labeled according to applicable DOT requirements before transport (NR 662.031).	✓	662.190(2)
P. Hazardous waste is marked according to applicable DOT requirements before transport (NR 662.032(1)).	✓	662.190(2)
Q. Containers of 119 gallons and less are marked with the "Hazardous Waste - Federal law prohibit improper disposal" label before transport (NR 662.032(2)).	✓	662.190(2)
R. Placards are offered to the initial transporter (NR 662.033).	✓	662.190(2)

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	✓	668.07(1)
B. Generator complies with the prohibition against dilution of wastes.	✓	668.03
C.A one-time written notice is sent to each treatment, storage or disposal facility with the initial waste shipment.	✓	668.07(1)
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	✓	668.07(1)
E. If the waste MEETS treatment standards, the LDR notice certifies the wastes may be land disposed without further treatment.	NA	668.07(1)
F. If the waste EXCEEDS treatment standards, the LDR notice notifies of appropriate treatment and applicable prohibitions.	✓	668.07(1)
G. Copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	✓	668.07(1)(h)
H. Generator with a contractual agreement complies with BOTH of the following: 1. The notification and certification requirements for the initial shipment of the waste subject to the agreement. 2. Retains a copy of the notification and certification with the tolling agreement for at least 3 years after the agreement is terminated or expires.	NA	668.07(1)(j)
I. Underlying hazardous constituents have been identified for characteristic wastes.	✓	668.09(1)

SMALL QUANTITY GENERATOR INSPECTION

Section 3: Land Disposal Restrictions

J. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste code. 2. The treatment standards for all applicable listed and characteristic waste codes.	✓	668.09(2)
K. If waste is treated in containers or tanks, the generator meets with BOTH of the following (NR 668.07(1)(e)): 1. Developed a waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	NA	662.192(1)(d)

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the previous calendar year have been submitted to the Department by March 1 of the following year.	✓	662.193(3)
B. Copy of each annual report is kept for at least 3 years from the due date of the report.	✓	662.193(1)(c)
C. If the signed manifest copy is not received in 60 days, a legible copy of the manifest indicating no confirmation of delivery was submitted to the department.	NA	662.193(2)

Section 5: Preparedness and Prevention

A. Generator has ALL of the following equipment, unless the equipment is not necessary for the types of wastes handled (665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	✓	662.192(1)(d)
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (665.0033).	✓	662.192(1)(d)
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (665.0034).	✓	662.192(1)(d)
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037(1)): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the potential resulting injuries or illnesses.	✓	662.192(1)(d)
E. Aisle space is provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	✓	662.192(1)(d)

Section 6: Emergency Procedures & Personnel Training Requirements

A. A person has been identified as an emergency coordinator who is responsible for coordinating all emergency response measures and is on the premises or able to reach the site within a short period of time.	✓	662.192(1)(e)1
B. ALL of the following information is posted next to the telephone: Written plan also available 1. Name and telephone number of the emergency coordinator. 2. Location of fire extinguishers, spill control material and, if present, fire alarm. 3. Telephone number of the fire department unless the generator has a direct alarm.	✓	662.192(1)(e)2
C. In the event of an emergency, the emergency coordinator takes the following actions: 1. In the event of a release, telephone the division of emergency management (800-943-0003) and comply with NR 706. 2. In the event of a fire, call the fire department or attempt to extinguish the fire, if appropriate. 3. In the event of a spill, contain the flow of hazardous waste to the extent possible and clean up the hazardous waste and contaminated materials or soil. 4. If there is a release that could threaten human health outside the facility or if a spill reaches surface water, immediately notify the national response center (800-424-8802).	✓	662.192(1)(e)4
D. All employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal operations and emergencies.	✓	662.192(1)(e)3

Section 7: Container Accumulation

A. Generator accumulates hazardous waste in containers. If NO, go to Section 8.	✓	
B. The accumulation start date is clearly marked and visible for inspection on each container. One drum in storage not marked w/ date → later corrected	X	662.192(1)(d)1
C. All containers are clearly marked with the words "Hazardous Waste".	✓	662.192(1)(d)2
D. The contents of a container that is leaking or in poor condition are transferred to another container in good condition (NR 665.0171).	NA	662.192(1)(b)
E. Containers are made or lined with materials compatible with the waste (NR 665.0172).	✓	662.192(1)(b)
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	✓	662.192(1)(b)
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	✓	662.192(1)(b)
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	✓	662.192(1)(b)
I. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	✓	662.192(1)(b)
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	NA	662.192(1)(b)
K. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	✓	662.192(1)(b)

Section 8: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 9.	✓	
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	✓	662.192(4)(a)
C. Satellite containers are under the control of the operator of the process generating the waste.	✓	662.192(4)(a)
D. Containers are always kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	✓	662.192(4)(a)1
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	✓	662.192(4)(a)1
F. Containers are marked "Hazardous Waste" or with other words that identify the contents.	✓	662.192(4)(a)2
G. If the container is leaking or in poor condition, contents are transferred to another container in good condition (NR 665.0171).	NA	662.192(4)(a)1
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	✓	662.192(4)(b)
I. Generator complies with the 180 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	✓	662.192(4)(b)

Section 9: Used Oil

A. Used oil is managed on-site. If NO, go to Section 10. I do not see	✓	
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	NA	679.10(2)(a)2
C. Used oil containers and tanks are in good condition and not leaking.	✓	679.22(2)
D. Used oil containers and tanks are marked "used oil".	✓	679.22(3)(a)
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.	✓	679.24
F. If oil containing materials are disposed of as a solid waste, the used oil has been properly drained so there is no visible sign of free-flowing oil and a waste determination has been properly made.	NA	679.10(3)(a)
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	NA	679.23

Section 9: Used Oil

H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	NA	679.11

Section 10: Universal Waste

A. The facility is a small quantity handler of universal waste (never accumulates more than 11,025 lbs). If NO, state in the comments section if the facility is a universal waste nonhandler, large handler or destination facility, and go to Section 11. Note: If the facility is a large handler, complete the large quantity handler of universal waste inspection form.	✓	
B. Universal waste has not been disposed, treated or diluted. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	✓	673.11
C. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.		673.13
D. Universal waste lamps and pesticides are placed in closed; structurally sound containers that are compatible with the waste and are not leaking.	X	673.13
E. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	X	673.14
F. Universal waste is accumulated for less than one year from the date generated or received from another handler.	✓	673.15(1)
G. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	NA	673.15(2)
H. Length of accumulation time is demonstrated by any of the following: 1. Each container is marked or labeled with the earliest date the waste is generated or received 2. The individual item of waste is marked or labeled with the date it was generated or received. 3. An inventory system identifying the date the waste was generated or received is maintained. 4. The universal waste is placed in a specific accumulation area identified with the earliest date the waste was generated or received.	✓	673.15(3)
i. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	✓	673.16
J. ALL of the following are met when a release occurs: 1. Release is immediately contained. 2. A waste determination is made. 3. Spill residue is disposed of properly as solid or hazardous waste.	NA	673.17
K. Handler sends the waste to a destination facility, foreign destination or another handler. Indicate the facilities in the comments section.	✓	673.18(1)
L. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	NA	673.18(3)

Section 10: Universal Waste

M. The following activities have occurred. If YES, complete the Universal Waste Small Quantity Handler inspection form. 1. Universal waste are sorted or disassembled. 2. Recalled pesticides are managed. 3. Universal waste shipments have been rejected. 4. Universal waste shipments have included hazardous or solid waste. 5. Universal waste is self-transported.	NA	

Section 11: Waste Minimization Certification

A. Small quantity generator has made a good faith effort to minimize the amount of waste generated (NR 662.027(2)).	✓	662.190(2)(a)

Section 12: Generator Status Evaluation

A. Between 220 lbs (100 kg) and 2,205 lbs (1,000 kg) of waste is generated in any month.	✓	662.190(1)
B. Waste is accumulated for 180 days or less.	✓	662.192(1)
C. Waste is accumulated for 270 days or less if the generator must ship 200 miles or more.	NA	662.192(2)
D. Less than 13,230 lbs (6,000 kg) of waste is accumulated.	✓	662.192(1)(a)
E. Describe any other activities the generator is conducting at the facility.		